

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 05-40027-FDS
)
DARRYL YOUNG,)
 Defendant.)

GOVERNMENT'S REQUESTED QUESTIONS FOR THE JURY VENIRE

The United States of America, by its attorneys, United States Attorney Michael J. Sullivan, and Assistant U. S. Attorney Suzanne Sullivan, hereby requests that, in addition to those questions commonly put to the venire in cases commenced in this Court, the Court pose the following questions to the prospective jurors in this case:

1. The United States of America is one of the litigants in this trial. You will hear the United States referred to throughout the trial as "the government." Have you, or any member of your immediate family, or anyone with whom you are close:

(a) ever been arrested, or ever answered charges (other than for an alleged moving traffic violation) in a criminal proceeding?

(b) ever filed a lawsuit or claim of any kind against any police or other law enforcement officer?

(c) ever engaged in litigation with the federal government, that is, ever filed a claim or lawsuit against the United States or any of its agencies, or answered some claim made against you by the federal government?

(d) been employed by the United States Attorney's Office, the United States Probation Office, the United States Pre-Trial Services Office, the United States District Court Clerk's Office, the Federal Bureau of

Investigation, Fort Devens or a state or federal correctional facility or prison?

2. Are you aware of any prejudice which you may have against the government which would in any way impair your ability to evaluate and judge fairly and impartially the facts of this case?

3. Some of the witnesses expected to be called by the United States at trial are Special Agents of the Federal Bureau of Investigations and correctional officers from Fort Devens federal correctional facility. These persons will be called to testify as "fact" witnesses.

Are you aware of any prejudice that you might have for or against a witness or other individual in this case where that witness or individual is shown to be a law enforcement officer?

4. Are you aware of any beliefs or feelings that would prevent you from completely and honestly applying the law, as I give it to you at the end of the case, to the facts as you find them?

5. Do you know of any reason why you cannot sit as a fair and impartial juror in the trial of this case?

Respectfully submitted,

MICHAEL J. SULLIVAN
Acting United States Attorney

BY:

/s/ Suzanne Sullivan
SUZANNE SULLIVAN
Assistant U.S. Attorney

Dated: March 21, 2007

CERTIFICATE OF SERVICE

I, Suzanne Sullivan, Assistant U.S. Attorney, do hereby certify that this document was served to defense counsel by electronic filing.

/s/ Suzanne Sullivan
SUZANNE SULLIVAN
Assistant U.S. Attorney